

1 Nino Abate, Esq. (SBN 017098)
 2 **THE LAW OFFICE OF NINO ABATE, PLC**
 3 300 W. Clarendon Ave., Suite 130
 4 Phoenix, Arizona 85013
 5 (480) 314-3304
 6 *Attorney for Defendants Brian and*
Corrina Colvin

7
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

8 Valentino Dimitrov, individually, and on
 9 behalf of all others similarly situated,

10 Plaintiffs,

11 vs.

12 Stavatti Aerospace, Ltd, a Minnesota
 13 corporation; Stavatti Aerospace, Ltd, a
 14 Wyoming corporation; Stavatti
 15 Corporation, a Minnesota corporation;
 16 Stavatti Immobiliare, Ltd, a Wyoming
 17 corporation; Stavatti Industries, Ltd, a
 18 Wyoming corporation; Stavatti Niagara,
 19 Ltd, a New York corporation; Stavatti
 20 Super Fulcrum, Ltd, a Wyoming
 21 corporation; Stavatti Ukraine, a Ukrainian
 22 business entity; Stavatti Heavy Industries
 23 Ltd, a Hawaii corporation; Christopher
 24 Beskar and Maja Beskar, husband and
 25 wife; Brian Colvin and Corrina Colvin,
 husband and wife; John Simon and Jean
 Simon, husband and wife; William
 McEwen and Patricia McEwen, husband
 and wife; Rudy Chacon and Jane Doe
 Chacon, husband and wife; and DOES 1
 through 10, inclusive,

26 Defendants.

Case No. 2:23-CV-00226-DJH

**COLVINS' JOINDER IN AND
 OBJECTION TO DEFENDANTS' MOTION
 FOR SUMMARY JUDGEMENT**

27 Defendants Brian ("Colvin") and Corrina Colvin, by and through undersigned attorney, join in
 28 part and object in part to the remaining Defendants' Motion for Summary Judgment for Lack of

1 Standing. The Colvin Defendants join in Defendants' Motion for Summary Judgment, but deny
2 Defendants' allegations that Colvin used "a fraudulent facsimile of the Company president's signature
3 lifted from a blank form non-disclosure agreement." The Colvin Defendants Colvin also deny
4 Defendants' allegations that Colvin took an "undisclosed and unauthorized fee of \$100,000." These
5 false allegations are a desperate attempt by Defendants to avoid liability for their own misdeeds.

6 DATED this 4th day of April, 2025.

7 **THE LAW OFFICE OF NINO ABATE, PLC**

8 By: /s/ Nino Abate
9 Nino Abate

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on this 4th day of April, 2025, I electronically transmitted the
12 foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal
13 along with copies transmitted to all parties and counsel of record via the CM/ECF system.

14 By: /s/ Nino Abate

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